



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND
POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION

05/DEC/2019

MEMORANDUM

Subject: Name of Pesticide Product: INMES S-Metolachlor Technical
EPA Reg. No. /File Symbol: 94145-E
DP Barcode: D451246
Decision No: 548536
Action Code: R334
PC Code: 108800 (S-metolachlor)

From: Eugenia McAndrew, Biologist *Eugenia McAndrew*
Chemistry, Inerts and Toxicology Assessment Branch
Registration Division (7505P)

To: Grant Rowland, RM Team 23
Herbicide Branch
Registration Division (7505P)

Applicant: INMES, LLC, LLC
c/o Pyxis Regulatory Consulting Inc.
4110 136th St. Ct. NW
Gig Harbor, WA 98332

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
S-metolachlor	98.3
Other ingredients:	1.7
Total:	100.0

ACTION REQUESTED: Similarity determination for 94145-E, proposed product, and 100-815, cited product.

BACKGROUND: INMES, LLC, LLC, has applied for registration of INMES S-Metolachlor Technical, EPA File Symbol 94145-E, claiming to be substantially similar to S-Metolachlor Technical, EPA Reg. No. 100-815. Both products are technical grade for manufacturing use only. The submission includes a Basic CSF dated January 4, 2019, label, data matrix and company letter.

The registrant is using the selective method of data citation to satisfy the acute toxicity data requirements. The data matrix lists acute toxicity studies with MRIDs 439289-15 to -20. A search of the OPP electronic databases shows that these studies are referenced in a 1997 Health Effects Division memo titled "Alpha-Metolachlor: Review of Bridging Data Studies and Acute Toxicity Studies with Formulations" (Dapson; D226782, D226830, D232249, D235664; TXR 0012310; 04/SEPT/1997). The cited studies were conducted on the technical.

RECOMMENDATIONS:

1. We compared the basic CSFs and labels for the proposed product, 94145-E, and the cited product, 100-815, and determined that the two products are substantially similar.
2. The cited acute toxicity data with MRIDS 439289-15 to -20 are acceptable to support this registration.
3. The acute toxicity profile for the proposed product, INMES S-Metolachlor Technical, EPA File Symbol 94145-E, based on the cited data, is as follows:

acute oral toxicity	III	cited	MRID 43928915
acute dermal toxicity	III	cited	MRID 43928916
acute inhalation toxicity	IV	cited	MRID 43928917
primary eye irritation	III	cited	MRID 43928918
primary skin irritation	IV	cited	MRID 43928919
dermal sensitization	positive	cited	MRID 43928920

4. The proposed Basic CSF and Alternate CSF #1 submitted for 94145-E must be reviewed and accepted by the product chemists in the Chemistry, Inerts and Toxicology Assessment Branch.

LABELING: Based on the toxicity profile above, the following are the precautionary and first aid statements for this product:

Product ID #: 94145-E

Product Name: INMES S-Metolachlor Technical

PRECAUTIONARY STATEMENTS

Signal Word: CAUTION

Hazards to Humans and Domestic Animals:

Harmful if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

First Aid:

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

If on skin or clothing:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

Note: The proposed label submitted for 94145-E has precautionary and first aid statements for the inhalation route of exposure. These statements are acceptable but the first aid statement for inhalation exposure must follow the other three first aid statements.